

III. REMARKS

Claims 1-25 are pending in this application. By this amendment, claims 1-2, 6-9, 11-14, 16-20 and 22-25 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-4, 6, 8-9, 11-12, 14-16, 18-22 and 24-25 are rejected under 35 U.S.C. 102(c) as allegedly being anticipated by Kimball et al. (U.S. Patent Pub. No. 2004/0034646), hereinafter “Kimball.” Applicants respectfully request withdrawal of the rejection in light of the following remarks.

With respect to amended claim 1, Applicants submit that the Office fails to show that Kimball discloses each and every element of the claimed invention, including “displaying a plurality of shortcuts for the object based on the user and a history of object operations performed by the user to manage the object.” (*See* claim 1 and as similarly recited by claims 11, 14 and 20). In particular, with respect to claim 1, the Office asserts that Applicants originally claimed “...history of object operations performed by the user” corresponds to “references to content frequently accessed by a user, such as by an adult or child user.” Office Action, p. 3. In response, Applicants submit that a generalized listing of content that *may* be of interest to a large population set (i.e., adults or children) is not equivalent to a plurality of shortcuts for an object based on a history of object operations performed by a particular user. (*See* amended claim 1.) Interpreting Kimball only for the purposes of this response, Applicants submit that Kimball merely teaches that, “...the adult toolbar 118 also includes a “Favorites” pull-down menu control

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118g that contains references to content frequently accessed by an adult.” Paragraph 0043. As such, Kimball merely discloses a list of “favorites,” i.e., websites or content sources that may be of interest to a generalized user browsing the internet. In sharp contrast, in the claimed invention, the shortcut is based on, *inter alia*, a history of object operations performed by the user to manage the object. See claim 1. In the present invention, the history of object operations performed by the user to manage the object is used to determine those object operations that have been most frequently selected by that particular user. Shortcuts can be displayed for the object operations that have been selected most frequently. Accordingly, if a user’s history indicates the frequent use of an object operation (e.g., cut and paste operations), shortcuts for those object operations are displayed. Kimball, however, fails to disclose this claimed element. Accordingly, Applicants submit that the Office fails to show each and every element of the claimed invention and respectfully request withdrawal of the rejection.

Furthermore, with respect to claim 1, Applicants submit that the Office fails to show that Kimball discloses, *inter alia*, a *plurality* of shortcuts for the object based on the user and a history of object operations performed by the user to manage the object. (Emphasis added.) In support of its rejection, the Office asserts that “the object corresponds to contents 1120a-1120d...,” and that the shortcut corresponds to a “Favorites” menu 118g (FIG. 5A), in the case that the interface is for adults, and a “Shortcuts” menu 124g, in the case that the interface is for children. However, even if, *arguendo*, the Office’s assertion is correct, Applicants submit that Kimball discloses only a single shortcut displayed for each user. In each case (adult or child), Kimball discloses that multiple objects (1120a-1120d) correspond to a single dropdown shortcut menu. In sharp contrast, in the claimed invention, a plurality of shortcuts are generated for each object. As shown by Applicants’ FIG. 2, the present invention discloses a plurality of object

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operation shortcuts 56 (CAUSE, STATUS, NOTIFY) that are displayed for each object based on a history of object operations performed by the user to manage the object (PAYROLL). The plurality of shortcuts represent the object operations that have been selected most frequently. Kimball, however, fails to disclose this claimed plurality of shortcuts. Accordingly, Applicants submit that the Office fails to show each and every element of the claimed invention and respectfully requests withdrawal of the rejection.

Still furthermore, even if assuming, *arguendo*, that Kimball discloses a user interface based on user profile information, Applicants submit that the Office fails to show that Kimball's user profile information is equivalent to a history of object operations performed by the user *to manage the object*. (Emphasis added) Interpreting Kimball only for purposes of this response, Applicants submit that Kimball merely discloses that "in one instance, a user profile may be modified to note an interest in sports based upon frequent user viewing of sports related content. The profile may be further customized based upon, for example, the user's viewing of baseball related content compared to the less frequent viewing of hockey related content." Paragraph 0063. Accordingly, Kimball simply discloses that a "favorites" list may be generated based on the subject matter associated with previously visited web pages/content sources. However, Applicants submit that a history of previously viewed web pages is not equivalent to a history of object operations performed by the user to manage the object. In Kimball, prior to the formation of the shortcut, the user provides no management of the object. Instead, Kimball's user simply views the desired content and the host creates the user interface. In contrast, in the claimed invention, the history of object operations includes object operations performed by the user to manage the object. For example, in the present invention, a user may frequently select to print a document immediately after saving the document. If the document (object) has a history of

being managed in a similar way, a shortcut for the print operation could be displayed once the user selects the save operation. Kimball, however, fails to disclose this claimed feature.

Accordingly, Applicants submit that Kimball fails to disclose each and every element of claim 1 and respectfully request withdrawal of the rejection.

With respect to independent claims 11, 14 and 20, Applicants herein incorporate the arguments presented above with respect to claim 1. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With respect to dependent claims 2-4, 6, 8-9, 12, 13-16, 18-19, 21-22 and 24-25, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. The dependent claims are believed to be allowable based on the above arguments, as well as for their own additional features.

In the Office Action, claims 7, 17 and 23 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Kimball, in view of Pickover et al. (U.S. Pat. Pub. No. 2004/0034646), hereinafter "Pickover." The Office admits that Kimball does not disclose an object having a plurality of object states. Office Action, p. 12. However, the Office asserts that "it would have been obvious...because the iconic shortcuts visually consolidate a group of webpage icons so that users can get an immediate feel for the organization of webpage links by topic and class." Id. In response, Applicants respectfully submit that a person having ordinary skill in the art would not be motivated to combine the teachings of Pickover, including dragging a webpage icon to a particular folder to alter the update schedule of the webpage, with the teachings of Kimball, including a technique of automatically producing a bank of user interface controls that provides a user with a collection of controls including "favorite" web pages tailored to a user's grouping. Although both Pickover and Kimball generally disclose modifying a GUI, there is no reason why

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a person skilled in the art would consider a very specific approach to modifying update times for a website that includes dragging an icon to a specific region of the GUI, as taught by Pickover, when they are faced with the problems of configuring a website interface based on the identity of the user, as taught by Kimball. Accordingly, Applicants respectfully submit that displaying a plurality of shortcuts based on a plurality of object states would not have been obvious to a person having ordinary skill in the art at the time of invention. Accordingly, Applicants submit that the Office has failed to prove a prima facie case of obviousness and respectfully request withdrawal or the rejection.

Furthermore, Applicants herein incorporate the arguments presented above with respect to the independent claim from which the claims depend. Claims 7, 17 and 23 are believed to be allowable based on the above arguments, as well as for their own additional features.

In the Office Action, claim 5 is rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Kimball, in view of Eruhimov et al. (U.S. Pat. Pub. No. 2004/0215591), hereinafter “Eruhimov.” Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. The dependent claim is believed to be allowable based on the above arguments, as well as for its own additional features.

In the Office Action, claims 10 and 13 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Kimball, in view of Terry William Ogletree et al. (Microsoft Windows XP Unleashed), hereinafter “Ogletree.” Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. The dependent claims are believed to be allowable based on the above arguments, as well as for their own additional features.

IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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